

NOC Application/Permit Revision/AOP Off-Permit Change Notification

NOTE: Any increase to abated or unabated PTE requires a full NOC modification

REASON FOR CHANGE

Submittal Date: June 15, 2010

Submittal Type: RTAM Submittal

☒ **NOC Application Revision**

:

DOE/RL-97-28,
Rev. 2

☐ **Condition Change/ Clarification**

WDOH Condition Number: _____

AOP Condition Number: _____

☐ **ALARACT Revision**

New ALARACT Rev Number: _____

PROJECT IDENTIFICATION

Project Title: Radioactive Air Emission Notice of Construction Fuel Removal for 105-KW Basin

Current NOC Application Number: DOE/RL-97-28, Rev. 2

AEI ID Number (AOP Emission Unit Number(s): 224 (Unit came under CERCLA post-permit)

Current WDOH Approval Letter Number(s): AIR 09-302

WDOH NOC ID Number: 231

DESCRIPTION OF CHANGE

Number of Attachments 1

WDOH will provide a new approval letter containing any new or modified conditions that result from the following proposed change.

Background Information Regarding Proposed Change:

The *Radioactive Air Emission Notice of Construction Fuel Removal for 105-KW Basin*, DOE/RL-97-28, Rev. 2, was obtained for regulatory approval of the modifications and changes to operations at the 105-KW Basin associated with removal of spent nuclear fuel, debris, and water from the basin, pursuant to the administrative requirements found in 40CFR61 and WAC 246-247. This action was taken prior to start of cleanup of the 100 Area K Basins under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

On June 2, 1998, EPA and Ecology in consultation with DOE decided to employ the CERCLA regulatory process for K Basins cleanup. This is documented in the Hanford Federal Facility Agreement and Consent Order Change Number M-34-98-02.

Per 40CFR300.400(e), no federal, state, or local permits are required for on-site response actions conducted pursuant to CERCLA sections 104, 106, 120, 121, or 122. Such is the case with the K Basins cleanup.

The K Basin Interim Remedial Action CERCLA Record of Decision (ROD) states that the DOE has been demonstrating compliance with WAC 246-247 via the notice of construction (NOC) process with the EPA and the Washington State Department of Health. The ROD further states that the administrative requirements of WAC 246-247 are not an Applicable or Relevant and Appropriate Requirement (ARAR), so if in the future, the DOE determines that meeting the administrative requirements of the NOC process may jeopardize timely performance of the K Basin Interim Remedial Action, the DOE may seek EPA approval to meet the substantive but not the administrative requirements of WAC 246-247. The administrative change represented by this particular NOC revision request does not at this time jeopardize timely performance of the remedial action, so it is being processed.

The Remedial Design Report and Remedial Action Work Plan for the K Basins Interim Remedial Action, DOE/RL-99-89, Rev. 1 states, “DOE will implement this NOC process in the following manner. Configuration control will be maintained over the existing K Basin NOCs and approval conditions through routine technical assistance meetings with the regulators. These NOCs will not be included in the Hanford Air Operating Permit. DOE will not develop additional NOCs during the term of active remediation of the K Basins.....”

Therefore, to maintain configuration control as directed, the NOC change described below is being presented for approval.

Reason for Proposed Change:

Ambient air monitors currently supporting the 100K CERCLA remedial action have been determined to merit relocation to support ongoing and future facility demolition and soil remediation activities. An analysis was performed to determine the requisite number of ambient air monitors needed to adequately support the remedial action. Using the combined area of the 100K Area activities as the source of fugitive/diffuse emissions, ambient air monitors were placed in an arc configuration approximately 500 meters out, taking into consideration such parameters as the potential impact of primary activities, potential source terms, prevailing wind directions, topography of the area, and dispersion coefficients. The proposed number and locations for ambient air monitor placements have been confirmed as providing adequate coverage.

Proposed Change (provide original and proposed wording):

Provides updates to Section 9.0 and replaces Figure 9-2.

In addition to the system described previously, ~~near-field~~near-facility ambient air monitoring currently is being performed and will continue at several locations in the 100-K Area around the 105-KW Basin. ~~This near field ambient air monitoring network is comprised of four monitors, designated as N-476, 477, 478, and 479. Figure 9-2 shows the current locations of the four ambient air monitors.~~

Near-facility monitoring is performed in the 105-KE/105-KW locale as part of the Hanford Site Near-Facility Monitoring Program, described in the Environmental Monitoring Plan (DOE/RL-91-50, latest revision), to monitor ambient air quality as may be impacted by localized fugitive/diffuse radionuclide emissions. This existing network of near-facility ambient air monitoring stations is maintained in the 100-K Area to address U.S. DOE requirements (as described in the referenced plan) which are separate from requirements under this remedial action. The latest Near-Facility Monitoring Program direction is to replace the 8 currently operating ambient air monitoring stations very near the 105-KE/105-KW Reactor Facilities and Ancillary Facilities with a perimeter of 6 new stations, each within a radius of roughly 500m from the footprint of the combined facilities. One existing ambient air monitoring station operated by PNNL and within the 500m arc will also provide data utilized for the Near-Facility Monitoring Program. In addition to the near-facility monitors, one ambient air monitor will be added east of the 105-KW Building for specific coverage of 105-KW Basin Operations. While additional adjustment in the number or location of near-facility monitoring stations may occur to support the Near-Facility Monitoring Program, it will be assured that no less than three 100-K Area near-facility monitoring stations will remain within the 100-K Area as part of the Near-Facility Monitoring Program during completion of the Remedial Action Work for the 105-KW Basin. Locations of the near-facility monitors and the additional ambient air monitor are shown in Figure 9-2.

Figure 9-2. Locations of Near-Field Monitoring Locations.

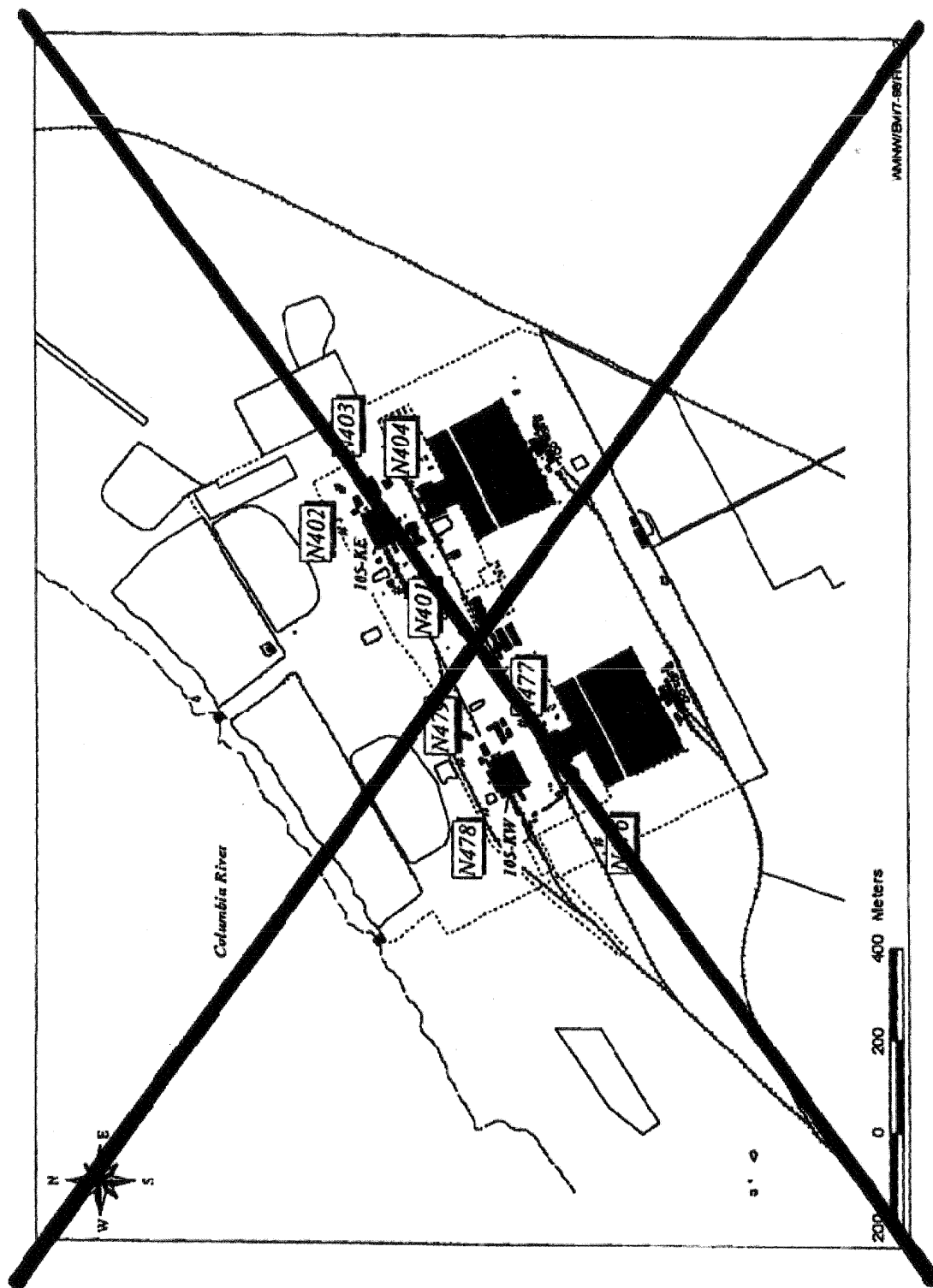
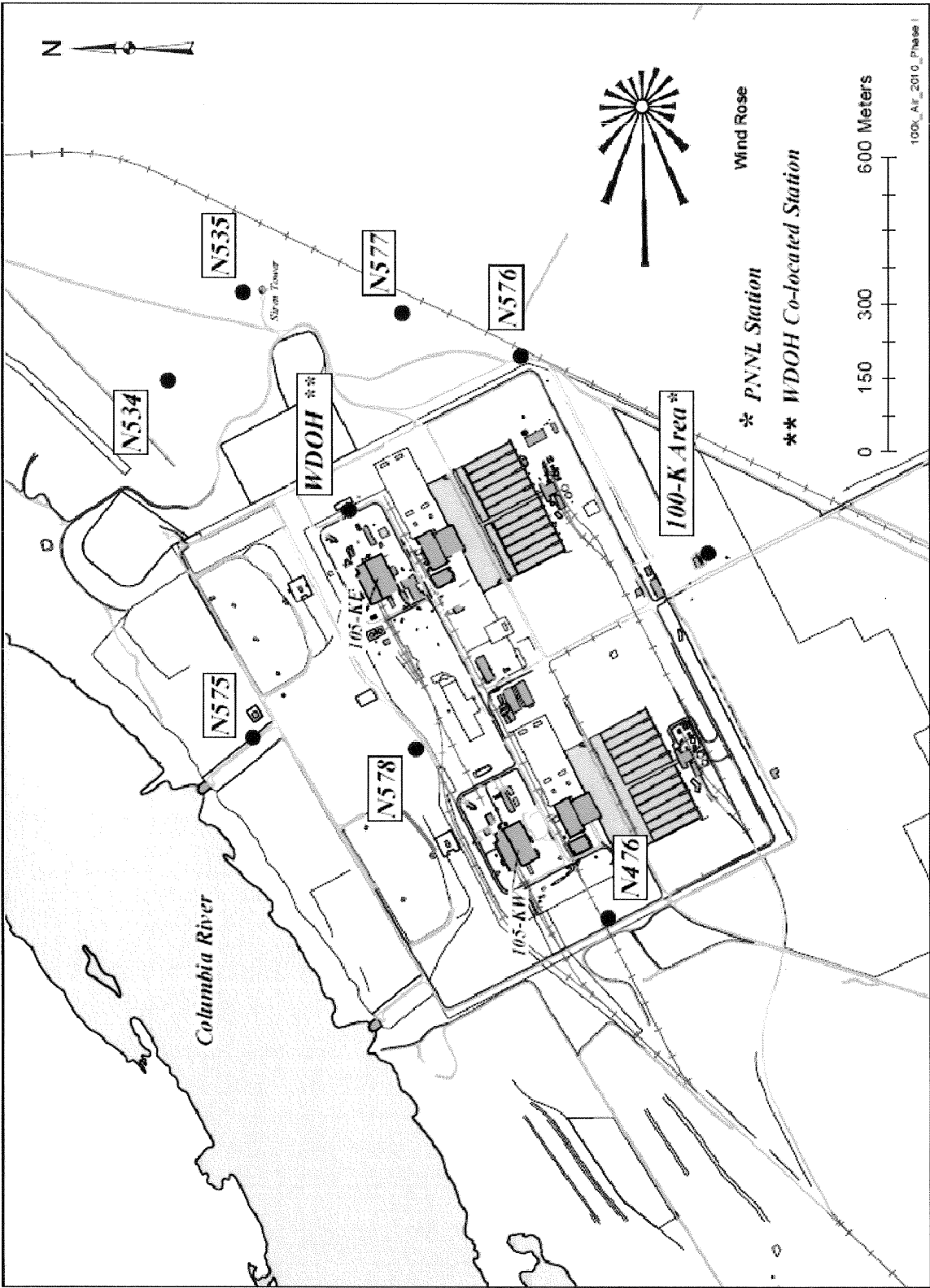
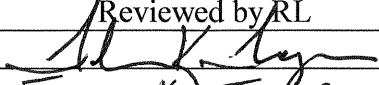

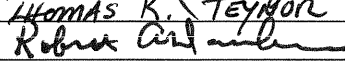


Figure 9-2. Locations of Ambient Air Near FacilityField Monitoring LocationsStations.



SIGNATURES

Reviewed by Contractor	Reviewed by RL	Approved by EPA
		
	THOMAS K. TEYNOR	Date: June 15, 2010
		Concurrence by DOH
Date:	Date: June 15, 2010	Date:

FOR WDOH USE ONLY

Data Entry Completed By: _____ Date: _____